

Message

From: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]
Sent: 12/18/2018 5:58:19 PM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]; Keller, Lynn [Keller.Lynn@epa.gov]; ROJAS-MICKELSON, DAEWON [rojas-mickelson.daewon@epa.gov]; Rohrer, Jim@DTSC [Jim.Rohrer@dtsc.ca.gov]; MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]
CC: Bradfish, Larry [Bradfish.Larry@epa.gov]; Hobel, Lawrence (Lhobel@cov.com) [Lhobel@cov.com]; Hvidsten, William [william.hvidsten@Rocket.com]
Subject: RE: [EXTERNAL] RE: Draft 2018 PPMR Update

All:

One thing that should be remembered is that the PCD is a 3-Party document (Aerojet, EPA and the State (Regional Board and DTSC) and that changes need the concurrence of all three. In that regard, we have not yet received a detailed request for adding a new OU11 for vapor. Without an understanding of what it does, how it works, and why it is needed we cannot take a formal opinion on whether we think the OU should be added. In addition, if EPA lists its priorities, it should be stated that these are EPA's priorities and not necessarily the same ones promoted in the PPMR. Does not mean we agree or do not agree with the priorities, but without the opportunity to sufficiently be reviewed and addressed by the group, they should be caveated as EPA priorities and looked at prior to next year's PPMR revision.

Alex

From: Fennessy, Christopher <christopher.fennessy@Rocket.com>
Sent: Monday, December 17, 2018 3:11 PM
To: Keller, Lynn <Keller.Lynn@epa.gov>; ROJAS-MICKELSON, DAEWON <rojas-mickelson.daewon@epa.gov>; Rohrer, Jim@DTSC <Jim.Rohrer@dtsc.ca.gov>; MacDonald, Alex@Waterboards <Alex.MacDonald@waterboards.ca.gov>; MacNicholl, Peter@DTSC <Peter.MacNicholl@dtsc.ca.gov>
Cc: Bradfish, Larry <Bradfish.Larry@epa.gov>; Hobel, Lawrence (Lhobel@cov.com) <Lhobel@cov.com>; Hvidsten, William <william.hvidsten@Rocket.com>
Subject: RE: [EXTERNAL] RE: Draft 2018 PPMR Update

Hi Lynn – The following are AR's responses to EPA's comments on the final PPMR – 2018 Update. Please feel free to contact me to discuss any of these responses. I intend on publishing the final PPMR with these edits by Friday, December 21. Chris

- KL1 – Relative to creating a new OU for vapor, the PCD requires both EPA and AR acceptance, which has not yet occurred. AR has substantial concerns over such a new OU, because, among other reasons, it will create uncertainty, potential duplication of effort and cost, and prolong the RI/FS process. Of course, AR is prepared to discuss the matter but is not prepared simply to add a new OU to the PPMR.
- KL2 – AR has removed Draft EOU Risk Assessment and Final EOU Risk Assessment from Table 5-1 to be consistent with other OU documents and schedules
- KL3 – Correct. If a table or figure was not included, no changes were made to last year's table or figure.
- KL4 – See attached. Attachment A begins on page 59. Note, the priorities were identified in 2004, based upon criteria specified in the PCD. If EPA's priorities have changed, AR is happy to incorporate EPA's language into the PPMR. Please provide a paragraph that can be inserted at the top of Page ES-2 and at the end of Section 3.3.
- TOC - Accepted addition of "iROD" for PGOU groundwater
- TOC – See response to KL1 for OU 11. This change was not accepted.
- Text inserted into Executive Summary regarding OU 5 RODs – accepted. However, the WGOU ROD was a final ROD, so this edit was not accepted.
- Text inserted into Executive Summary regarding OU 11 - AR has never received a "proposal" from EPA regarding OU 11. This text was not accepted.

- RD5 and KL6 - OU 10 language in Executive Summary accepted.
- KL7 – Due to the short notice regarding organizational changes, this comment will be held for the next PPMR update
- RD8 – All of the RCRA units are already investigated in the CERCLA program. Please let me know if you would like to see the SAP figures that include these features and the SAP DQO tables that include the investigation of these units.
- Backslash in the 3rd paragraph of Section 2.3.2 – What is purpose of adding the backslash? This edit was not accepted.
- RD11 – The text has been modified as follows: Based on an approach to remain consistent and compatible with surrounding land uses, AR projects that a large portion of the Site may be redeveloped for mixed-use purposes (residential, occupational, commercial, industrial, and recreational).
- Section 3.2 edits on the paragraph referring to Area 40 have been accepted.
- Addition of final sentence of Section 3.2 – See response to KL1. This text was not accepted.
- Section 3.3 addition of bullet – The list of bullets originally included in this document are captured from the PCD. AR understands that EPA priorities may change from time to time. In accordance with AR's response to KL4, please provide a paragraph that can be added to the end of Section 3.3 that describes EPA's current priorities.
- Section 3.3, paragraph 6 text edits were accepted
- Section 3.3, inserted paragraph following paragraph 6 – see response to KL1.
- Section 4.1, text edits to the first paragraph and following bullets were accepted.
- Section 5 text edit – See response to KL1. This text was not accepted.
- Section 6, inserted paragraph regarding OU 11. See response to KL1. This text was not accepted.
- KL12 – The reference listed in Section 7 were used to develop the PPMR document. In general, this list of references includes the documents relied upon to create the initial PPMR in 2004 and includes the current documents for each OU, which document the current status.
- Section 7, request for additional references. References to the Area 40 FS and the March 2018 vapor intrusion report were added. Should we also add the reference to the BERA SAP?

From: Keller, Lynn [<mailto:Keller.Lynn@epa.gov>]

Sent: Friday, December 14, 2018 7:44 PM

To: Fennessy, Christopher; ROJAS-MICKELSON, DAEWON; jim.rohrer@dtsc.ca.gov; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov); MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov)

Cc: Bradfish, Larry

Subject: [EXTERNAL] RE: Draft 2018 PPMR Update

Hi, Chris.

Attached please find EPA's comments in track changes to the most recent Aerojet PPMR:

Thank you,
Lynn

Lynn M. Keller, EI, PMP
Remedial Project Manager SFD-7-1
415.947.4162

US EPA Region 9
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San Francisco, CA 94105

From: Fennessy, Christopher <christopher.fennessy@Rocket.com>

Sent: Thursday, October 25, 2018 5:26 PM

To: ROJAS-MICKELSON, DAEWON <rojas-mickelson.daewon@epa.gov>; Keller, Lynn <Keller.Lynn@epa.gov>; jim.rohrer@dtsc.ca.gov; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov) <Alex.MacDonald@waterboards.ca.gov>; MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov) (Peter.MacNicholl@dtsc.ca.gov) <Peter.MacNicholl@dtsc.ca.gov>
Subject: Draft 2018 PPMR Update

Hi Everyone – Please see the attached draft 2018 update to the Program Plan Modification Report in red-line/strike-out. Quite a few changes based upon EPA comments, AR announcement of facility closure, and RCRA updates. For RCRA table, I highlighted the updates. Please review. In order to incorporate your comments into the final version, please send comments to me by November 30. Thanks! Chris

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